

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:
TRUC T LE

WELLS FARGO BANK, N.A.

Movant

vs.

TRUC T LE,
Debtor

Case No. 20-12121-mdc
Chapter 13

**MOTION TO RE-ASSOCIATE NOTICE OF PAYMENT CHANGE LETTERS WITH
CLAIM #2**

AND NOW COMES, Wells Fargo Bank, N.A. (the “Movant”), by its attorneys, Brock and Scott PLLC, and files this Motion to Re-Associate Notice of Payment Change Letters With Claim #2, representing as follows:

1. Debtor filed their bankruptcy Petition on April 27, 2020.
2. On May 7, 2020, Wells Fargo Bank, N.A., filed a proof of claim listing \$147.29 in arrears and a total debt of \$203,956.95. Said POC was listed in the Claims Register as Claim #2-1. Attached hereto as Exhibit “A” is a copy of the Proof of Claim without exhibits.
3. In connection with the above referenced Proof of Claim, and as required under the pertinent Court Rules, Wells Fargo Bank, N.A., filed a Notices of Mortgage Payment Change on December 2, 2021 and December 15, 2021. Attached hereto as Exhibit “B” are copies of the Notices of Mortgage Payment Changes.
4. By inadvertence and mistake, Wells Fargo Bank, N.A., filed the Notices of Mortgage Payment Changes on Claim 5-1 instead of Claim 2-1.
5. It should be noted that both Claim #2-1 and #5-1 were filed by Wells Fargo Bank, N.A., but represent two different and separate accounts.

6. The Notice of Mortgage Payment Change was filed with the correct financial information and at all times herein, the Debtors and the Trustee was apprised of this payment change. However, out of abundance of caution and in a good faith effort to rectify this error, Wells Fargo Bank, N.A., requests that this Court re-associate the Notices with the proper proof of claim: Claim #2-1.

7. The Debtor will not be harmed with this reassociation.

WHEREFORE, Movant respectfully request that this Honorable Court re-associate the Notice with the proper proof of Claim: Claim#2-1. .

Date: September 28, 2022

/s/Andrew Spivack
Andrew Spivack, PA Bar No. 84439
Matt Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
Jay Jones, PA Bar No. 86657
Attorney for Creditor
BROCK & SCOTT, PLLC
8757 Red Oak Boulevard, Suite 150
Charlotte, NC 28217
Telephone: (844) 856-6646
Facsimile: (704) 369-0760
E-Mail: PABKR@brockandscott.com